

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT KENNY,

Plaintiff,

V.

PACIFIC INVESTMENT
MANAGEMENT COMPANY LLC, a
Delaware limited liability company;
PIMCO INVESTMENTS LLC,

Defendants.

No. CV 14-1987-RSM

**SECOND STIPULATION AND ORDER
TO EXTEND TIME BY WHICH
PLAINTIFF IS REQUIRED TO FILE
CERTAIN UNSEALED OR REDACTED
DOCUMENTS PER ORDER ON
MOTIONS TO SEAL (DKT. 238)**

SECOND STIPULATION AND ORDER TO EXTEND TIME BY WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN UNSEALED OR REDACTED DOCUMENTS PER ORDER ON MOTIONS TO SEAL (DKT. 238)
(No. CV 14-1987-RSM)

1 Plaintiff Robert Kenny (“Plaintiff”) and Defendants Pacific Investment Management
2 Company LLC and PIMCO Investments LLC (collectively, “Defendants”), through their
3 undersigned counsel of record, hereby stipulate and agree as follows:
4
5

6 In its July 6, 2018 Order on Motions to Seal (Dkt. #238) (the “Order”), the Court granted
7 in part and denied in part the Motion to Seal filed by Defendants (Dkt. #235). The Court ordered
8 that Plaintiff file new unsealed or redacted versions of certain documents identified in the Order
9 no later than twenty-one days from the date of the Order, or by July 27, 2018.
10
11

12 As required by the Order, the parties held a meet-and-confer and worked cooperatively to
13 prepare new unsealed and redacted versions of certain documents. The parties have recently re-
14 engaged in confidential settlement negotiations that originated from a Court-ordered mediation
15 held on May 4, 2018 before the Honorable Layn Philips. *See* Parties’ Notice of Compliance with
16 Mediation Order (Dkt. #214).
17
18

19 On July 26, in the interest of continuing these meaningful settlement negotiations, the
20 parties respectfully requested that the July 27, 2018 deadline, by which the Court originally
21 ordered Plaintiff to file new unsealed or redacted versions of certain documents, be extended by
22 one week to August 3, 2018. *See* Stipulation and Order to Extend Time by Which Plaintiff is
23 Required to File Certain Unsealed or Redacted Documents Per Order on Motions to Seal (Dkt.
24 #238) (Dkt. #240). That same day, the Court granted the parties’ request and extended the deadline
25 to August 3, 2018. *Id.*
26
27

28 Since July 26, the parties have remained actively engaged in meaningful settlement
29 discussions. In the interest of continuing these negotiations, the parties respectfully request that
30
31

32 **SECOND STIPULATION AND ORDER TO EXTEND TIME BY
33 WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN
34 UNSEALED OR REDACTED DOCUMENTS PER ORDER ON
35 MOTIONS TO SEAL (DKT. 238)**
36 (No. CV 14-1987-RSM) – 1

37 **Ropes & Gray LLP**
38 Prudential Tower,
39 800 Boylston Street
40 Boston, MA 02199-3600
41 Phone: 617.951.7000
42 Fax: 617.951.7050

43 **Perkins Coie LLP**
44 1201 Third Avenue, Suite 4900
45 Seattle, WA 98101-3099
46 Phone: 206.359.8000
47 Fax: 206.359.9000

1 the August 3, 2018 deadline, by which the Court most recently ordered Plaintiff to file new
2 unsealed or redacted versions of certain documents, be extended by one week to August 10, 2018.
3

4 Once again, the parties do not seek an extension or stay of any of the other deadlines or
5 dates in this case.
6

7 //
8

9 //
10

11 //
12

13 //
14

15 //
16

17 //
18

19 //
20

21 //
22

23 //
24

25 //
26

27 //
28

29 //
30

31 //
32

33 //
34

35 //
36

37 //
38

39 //
40

41 //
42

43 //
44

45 //
46

47 //
48

49 //
50

51 **SECOND STIPULATION AND ORDER TO EXTEND TIME BY
WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN
UNSEALED OR REDACTED DOCUMENTS PER ORDER ON
MOTIONS TO SEAL (DKT. 238)**
(No. CV 14-1987-RSM) – 2

Ropes & Gray LLP
Prudential Tower,
800 Boylston Street
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 Dated: this 2nd day of August, 2018.
2
3
4

5 By: /s/ Michael D. Woerner
6 By: /s/ Tana Lin
7 By: /s/ Laura R. Gerber
8 By: /s/ Ian Mensher
9 Michael D. Woerner, WSBA No. 15452
10 Tana Lin, WSBA No. 35271
11 Laura R. Gerber, WSBA No. 34981
12 Ian Mensher, WSBA #39593
13 **Keller Rohrback L.L.P.**
14 1201 Third Avenue, Suite 3200
15 Seattle, WA 98101
16 Telephone: 206-623-1900
17 Facsimile: 206-623-3384
18 Email: mwoerner@kellerrohrback.com
19 tlin@kellerrohrback.com
20 lgerber@kellerrohrback.com
21 imensher@kellerrohrback.com
22
23
24 Michael J. Brickman (*Admitted Pro Hac Vice*)
25 **Richardson, Patrick, Westbrook &**
26 **Brickman, LLC**
27 174 East Bay Street
28 Charleston, SC 29401
29 Telephone: 843-727-6520
30 Facsimile: 843-727-3103
31 Email: mbrickman@rpwb.com
32
33 Nina Fields Britt (*Admitted Pro Hac Vice*)
34 James C. Bradley (*Admitted Pro Hac Vice*)
35 Matthew A. Nickles (*Admitted Pro Hac Vice*)
36 **Richardson, Patrick, Westbrook &**
37 **Brickman, LLC**
38 1037 Chuck Dawley Boulevard, Bldg. A
39 Mount Pleasant, SC 29465
40 Telephone: 843-727-6500
41 Facsimile: 843-216-6509
42 Email: nfields@rpwb.com
43 jbradley@rpwb.com
44 mnickles@rpwb.com
45
46
47
48
49
50
51

Attorneys for Plaintiff

SECOND STIPULATION AND ORDER TO EXTEND TIME BY
WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN
UNSEALED OR REDACTED DOCUMENTS PER ORDER ON
MOTIONS TO SEAL (DKT. 238)
(No. CV 14-1987-RSM) - 3

By: /s/ Ronald L. Berenstain
By: /s/ Sean C. Knowles

Ronald L. Berenstain, WSBA No. 7573

Sean C. Knowles, WSBA No. 39893

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206-359-8000

Facsimile: 206-359-9000

Email: rberenstain@perkinscoie.com

sknowles@perkinscoie.com

John D. Donovan (*Admitted Pro Hac Vice*)

Robert A. Skinner (*Admitted Pro Hac Vice*)

Amy D. Roy (*Admitted Pro Hac Vice*)

Ropes & Gray

Prudential Tower

800 Boylston Street

Boston, MA 02199-3600

Telephone: 617-951-7000

Facsimile: 617-951-7050

Email: john.donovan@ropesgray.com

robert.skinner@ropesgray.com

amy.roy@ropesgray.com

John C. Ertman (*Admitted Pro Hac Vice*)

Ropes & Gray

1211 Avenue of the Americas

New York, NY 10036-8704

Telephone: 212-596-9000

Facsimile: 212-596-9090

Email: john.ertman@ropesgray.com

*Attorneys for Defendants Pacific Investment
Management Company LLC and PIMCO
Investments LLC*

Ropes & Gray LLP

Prudential Tower,

800 Boylston Street

Boston, MA 02199-3600

Phone: 617.951.7000

Fax: 617.951.7050

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Phone: 206.359.8000

Fax: 206.359.9000

ORDER

Pursuant to stipulation by the parties, and for good cause shown, the August 3, 2018 deadline, by which the Court most recently ordered Plaintiff to file new unsealed or redacted versions of certain documents in the Stipulation and Order to Extend Time by Which Plaintiff is Required to File Certain Unsealed or Redacted Documents Per Order on Motions to Seal (Dkt. #238) (Dkt. #240), is extended by one week to August 10, 2018.

IT IS SO ORDERED this 2nd day of August, 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

SECOND STIPULATION AND ORDER TO EXTEND TIME BY WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN UNSEALED OR REDACTED DOCUMENTS PER ORDER ON MOTIONS TO SEAL (DKT. 238)
(No. CV 14-1987-RSM) - 4

MOTIONS TO SEAL (D.R.)
(No. CV 14-1987-RSM) - 4

Ropes & Gray LLP
Prudential Tower,
800 Boylston Street
Boston, MA 02199-3600
Phone: 617.951.7000
Fax: 617.951.7050

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1
2 Presented by:
3

4 By: /s/ Michael D. Woerner
5 By: /s/ Tana Lin
6 By: /s/ Laura R. Gerber
7 By: /s/ Ian Mensher
8 Michael D. Woerner, WSBA No. 15452
9 Tana Lin, WSBA No. 35271
10 Laura R. Gerber, WSBA No. 34981
11 Ian Mensher, WSBA #39593
12 **Keller Rohrback L.L.P.**
13 1201 Third Avenue, Suite 3200
14 Seattle, WA 98101
15 Telephone: 206-623-1900
16 Facsimile: 206-623-3384
17 Email: mwoerner@kellerrohrback.com
18 tlín@kellerrohrback.com
19 lgerber@kellerrohrback.com
20 imensher@kellerrohrback.com

21
22 Michael J. Brickman (*Admitted Pro Hac Vice*)
23 **Richardson, Patrick, Westbrook &**
24 **Brickman, LLC**
25 174 East Bay Street
26 Charleston, SC 29401
27 Telephone: 843-727-6520
28 Facsimile: 843-727-3103
29 Email: mbrickman@rpwb.com

30
31 Nina Fields Britt (*Admitted Pro Hac Vice*)
32 James C. Bradley (*Admitted Pro Hac Vice*)
33 Matthew A. Nickles (*Admitted Pro Hac Vice*)
34 **Richardson, Patrick, Westbrook &**
35 **Brickman, LLC**
36 1037 Chuck Dawley Boulevard, Bldg. A
37 Mount Pleasant, SC 29465
38 Telephone: 843-727-6500
39 Facsimile: 843-216-6509
40 Email: nfields@rpwb.com
41 jbradley@rpwb.com
42 mnuckles@rpwb.com

43
44 *Attorneys for Plaintiff*

45
46 **SECOND STIPULATION AND ORDER TO EXTEND TIME BY**
47 **WHICH PLAINTIFF IS REQUIRED TO FILE CERTAIN**
48 **UNSEALED OR REDACTED DOCUMENTS PER ORDER ON**
49 **MOTIONS TO SEAL (DKT. 238)**
50 **(No. CV 14-1987-RSM) – 5**

51 By: /s/ Ronald L. Berenstain
52 By: /s/ Sean C. Knowles
53 Ronald L. Berenstain, WSBA No. 7573
54 Sean C. Knowles, WSBA No. 39893
55 **Perkins Coie LLP**
56 1201 Third Avenue, Suite 4900
57 Seattle, WA 98101-3099
58 Telephone: 206-359-8000
59 Facsimile: 206-359-9000
60 Email: rberenstain@perkinscoie.com
61 sknowles@perkinscoie.com

62
63 John D. Donovan (*Admitted Pro Hac Vice*)
64 Robert A. Skinner (*Admitted Pro Hac Vice*)
65 Amy D. Roy (*Admitted Pro Hac Vice*)
66 **Ropes & Gray**
67 Prudential Tower
68 800 Boylston Street
69 Boston, MA 02199-3600
70 Telephone: 617-951-7000
71 Facsimile: 617-951-7050
72 Email: john.donovan@ropesgray.com
73 robert.skinner@ropesgray.com
74 amy.roy@ropesgray.com

75
76 John C. Ertman (*Admitted Pro Hac Vice*)
77 **Ropes & Gray**
78 1211 Avenue of the Americas
79 New York, NY 10036-8704
80 Telephone: 212-596-9000
81 Facsimile: 212-596-9090
82 Email: john.ertman@ropesgray.com

83
84 *Attorneys for Defendants Pacific Investment*
85 *Management Company LLC and PIMCO*
86 *Investments LLC*

87
88 **Ropes & Gray LLP**
89 Prudential Tower,
90 800 Boylston Street
91 Boston, MA 02199-3600
92 Phone: 617.951.7000
93 Fax: 617.951.7050

94
95 **Perkins Coie LLP**
96 1201 Third Avenue, Suite 4900
97 Seattle, WA 98101-3099
98 Phone: 206.359.8000
99 Fax: 206.359.9000